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EXHIBIT A

The following procedures (the “**RKS Procedures**”) are proposed by the RKS Claimants pursuant to the Enforcement Order [Dkt. No. 13612] to streamline the ADR Procedures and facilitate the just, speedy, and efficient resolution of the RKS Claimants’ claims now that the ADR Procedures have been exhausted as to their claims. The RKS Procedures further serve as a response to the Securities Claims Merits Litigation Procedures – Part I, as proposed by Reorganized Debtors, which purport to set an unreasonable timeline for the deadline for objections to Securities Claims and purport to add procedural requirements for the Securities Claims not found in bankruptcy law, the Plan, the ADR Procedures, or any other Order of this Court. Unlike the Securities Claims Merits Litigation Procedures – Part I, the RKS Procedures are consistent with applicable bankruptcy law and the purpose of the Plan and the ADR Procedures to expedite resolution of the Securities Claims.

A. Proof of Claim Amendment Deadline

Within 30 days of the Court’s scheduled hearing on the Sixth Extension Motion (June 7, 2023)—*i.e.*, by July 7, 2023—the RKS Claimants will file an omnibus amended proof of claim (the “**Amended Claim**”) that will supplement the trading information of each RKS Claimant already in possession of Reorganized Debtors and provide sufficient detail underlying the RKS Claimants’ claims for Reorganized Debtors to submit objections. Pursuant to Federal Rule of Bankruptcy 3001(f), the Amended Claim will constitute *prima facie* evidence of the validity and amount of the RKS Claimants’ claims.

B. Objection Deadline

Within 60 days of the Court’s scheduled hearing on the Sixth Extension Motion—*i.e.*, by August 7, 2023¹—Reorganized Debtors will file objections to the Amended Claim, pursuant to Federal Rule of Bankruptcy 3007, which will include all specific objections to the RKS Claimants’ claims that have not already been filed as omnibus objections. The objections must not be limited to purported deficiencies in the Amended Claim, but must also include any affirmative defenses and objections on the merits that Reorganized Debtors intend to assert at hearings in this action.

¹ August 7, 2023 is the first business day after the 60th day following the hearing.

C. Status Report

To facilitate the Court's review of the Amended Claim and objections thereto, by August 21, 2023, Reorganized Debtors and the RKS Claimants will jointly file a status report with the Court (a) providing a list of issues that the parties agree involve only matters of law and can be argued at a hearing at which the Court will not receive evidence; (b) providing a list of issues that the parties agree involve factual disputes and must be argued at an evidentiary hearing before the Court; (c) providing the parties' respective positions on any issues about which they disagree whether they involve only matters of law or factual disputes; (d) updating the Court on the status of any further resolutions of the RKS Claimants' claims; (e) setting out the parties' agreed-upon discovery plan for any issues the parties agree involve factual disputes and require an evidentiary hearing (or the parties' respective positions in the event there is a dispute on a proposed discovery plan); and (f) addressing any further issues requiring a determination by the Court at the initial status conference pursuant to Local Bankruptcy Rule 3007-1(b).

D. Initial Status Conference

At the Court's earliest convenience following August 21, 2023, the Court will hold a status conference pursuant to Local Bankruptcy Rule 3007-1(b). Subject to the Court's discretion, at the conference the Court will hear argument on any issues the parties agree involve only matters of law and/or set a future hearing date to hear argument on such issues. Subject to the Court's discretion, the Court will also set evidentiary hearing dates for any issues the parties agree involve factual disputes. Subject to the Court's discretion, the Court will resolve any disputes the parties have concerning whether issues involve only matters of law or factual disputes and set the appropriate hearing dates for those issues accordingly. Subject to the Court's discretion, the Court will also resolve any disputes the parties have concerning the discovery schedule and render an Order concerning the deadlines for fact and/or expert discovery. For any issues the Court decides will be subject to an evidentiary hearing, the discovery period(s) will commence immediately following the status conference.